

**IN THE SUPERIOR COURT OF CATOOSA COUNTY  
STATE OF GEORGIA**

CASE NO.:

**GARRY DEAN TAYLOR, JR.,**

**Plaintiff,**

**vs.**

**MEAGAN MARIAH WATSON,  
an Individual, and WESTERN EXPRESS INC.,  
a Domestic For-Profit Corporation,**

**Defendants.**

**COMPLAINT**

Plaintiff, GARRY DEAN TAYLOR, JR., by and through undersigned counsel, hereby files this Complaint against Defendants, MEAGAN MARIAH WATSON, an Individual, and WESTERN EXPRESS INC., a Domestic For-Profit Corporation, and alleges as follows:

**PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff, GARRY DEAN TAYLOR, JR., an individual, resides in Putnam County, Florida.
2. Defendant, MEAGAN MARIAH WATSON, an individual, resides in Randolph County, West Virginia.
3. Defendant, WESTERN EXPRESS INC., is a Domestic For-Profit Corporation, with principal place of business located at 7135 Centennial Place, Nashville, Tennessee.
4. The cause of action set out herein originated in Catoosa County, Georgia.
5. Jurisdiction and venue are proper in this Court under O.C.G.A. 40-12-3 (2010).

**FACTS IN SUPPORT OF CLAIMS**

6. On or about June 16, 2021, Defendant, MEAGAN MARIAH WATSON owned, operated, or maintained a motor vehicle bearing Tag number J7314HY and Trailer Tag number, U970777.

JUN 16, 2022 03:26 PM

*Tracy Brown*  
Tracy Brown, Clerk  
Catoosa County, Georgia

7. At that time and place, Defendant, MEAGAN MARIAH WATSON, negligently operated or maintained the motor vehicle so that it collided with Plaintiff's motor vehicle.
8. As a direct and proximate result of the negligent actions of Defendant, MEAGAN MARIAH WATSON, Plaintiff, GARRY DEAN TAYLOR, JR., suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, expense of hospitalization, medical and nursing care and treatment in the past and in the future, and/or aggravation of pre-existing condition. These losses are either permanent or continuing, and Plaintiff will continue to suffer these losses in the future.

**COUNT I: MOTOR VEHICLE NEGLIGENCE**  
**(As to Defendant, Meagan Mariah Watson)**

Plaintiff, GARRY DEAN TAYLOR, JR., adopts by reference, as if set out fully and completely in this Count, the following statements of this Complaint: Paragraphs 1 through 9 and further alleges:

9. On or about June 16, 2021, Defendant, MEAGAN MARIAH WATSON, operated a motor vehicle in Catoosa County, Georgia.
10. At approximately the same place and time, Defendant, MEAGAN MARIAH WATSON, negligently maintained or operated the motor vehicle described in paragraph five (5), such that it collided with Plaintiff's motor vehicle.
11. As a direct and proximate result of the negligent actions of Defendant, MEAGAN MARIAH WATSON, Plaintiff, GARRY DEAN TAYLOR, JR., suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, expense of hospitalization, medical and nursing care and treatment in the past and in the future, and/or aggravation of pre-existing condition. These

losses are either permanent or continuing, and Plaintiff will continue to suffer these losses in the future.

**COUNT II: MOTOR VEHICLE NEGLIGENCE**  
**(As to Defendant, Western Express Inc.)**

Plaintiff, GARRY DEAN TAYLOR, JR., adopts by reference, as if set out fully and completely in this Count, the following statements of this Complaint: Paragraphs 1 through 10 and further alleges:

12. On or about June 16, 2021, Defendant, WESTERN EXPRESS INC., was the owner of the vehicle operated by Defendant, MEAGAN MARIAH WATSON, involved in the crash which occurred in Catoosa County, Georgia.
13. At all times material hereto, Defendant, MEAGAN MARIAH WATSON, was a permissive driver.
14. WESTERN EXPRESS INC. consented to the use of the vehicle by Defendant, MEAGAN MARIAH WATSON.
15. At all times material hereto, Defendant, MEAGAN MARIAH WATSON, was an employee of Defendant, WESTERN EXPRESS INC., and acting within the course and scope of her employment.
16. As described in this Complaint, Defendant, MEAGAN MARIAH WATSON, was negligent on the occasion in question, and such negligence was the proximate cause of Plaintiff's injuries and damages.
17. Under the respondeat superior doctrine, WESTERN EXPRESS INC., is strictly liable for the damages to Plaintiff resulting from the negligent operation of such vehicle by Defendant, MEAGAN MARIAH WATSON.
18. As a direct and proximate result of the negligent actions of Defendant, WESTERN EXPRESS INC., Plaintiff, GARRY DEAN TAYLOR, JR., suffered bodily injury and

resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, expense of hospitalization, medical and nursing care and treatment in the past and in the future, and/or aggravation of pre-existing condition. These losses are either permanent or continuing, and Plaintiff will continue to suffer these losses in the future.

**COUNT III: NEGLIGENT ENTRUSTMENT**

(As to Defendant, Western Express Inc.)

Plaintiff, GARRY DEAN TAYLOR, JR., adopts by reference, as if set out fully and completely in this Count, the following statements of this Complaint: Paragraphs 1 through 18 and further alleges:

19. On or about June 16, 2021, Defendant, WESTERN EXPRESS INC., was the owner of the vehicle operated by Defendant, MEAGAN MARIAH WATSON, involved in the crash which occurred in Catoosa County, Georgia.
20. On or about June 16, 2021, Defendant, WESTERN EXPRESS INC., negligently entrusted Defendant, MEAGAN MARIAH WATSON with the vehicle.
21. As a result of the negligence of Defendant, WESTERN EXPRESS INC., on or about June 16, 2021, Defendant, MEAGAN MARIAH WATSON negligently operated and/or negligently maintained the motor vehicle such that a collision occurred with Plaintiff's vehicle.
22. The injuries, harm, and damages were incurred by the Plaintiff as a result of the use of the vehicle by Defendant, MEAGAN MARIAH WATSON, in a negligent or reckless manner which because of youth, inexperience, and/or prior actions, Defendant, WESTERN EXPRESS INC., knew, or had reason to know the actions were likely and involved an unreasonable risk of harm to others while driving the vehicle.

23. Defendant, WESTERN EXPRESS INC., had the right and the power to prohibit the use of this vehicle by Defendant, MEAGAN MARIAH WATSON.

24. As a direct and proximate result of the negligent actions of Defendant, WESTERN EXPRESS INC., Plaintiff, GARRY DEAN TAYLOR, JR., without any contributing negligence, suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, inconvenience, expense of hospitalization, medical and nursing care and treatment in the past and in the future, and/or aggravation of pre-existing condition. These losses are either permanent or continuing, and Plaintiff will continue to suffer these losses in the future.

WHEREFORE, Plaintiff prays as follows:

- (a) That Complaint and Summons be issued requiring the Defendant to be served as required by law and requiring the Defendant to answer this Complaint;
- (b) For a trial by a fair and impartial jury, as by law provided;
- (c) That Plaintiff recover special damages in an amount to be proven at trial;
- (d) That Plaintiff recover damages in an amount to be determined by the enlightened conscience of a fair and impartial jury;
- (f) That Plaintiff recover attorney's fees in an amount to be proven at trial; and
- (g) For such other relief as this Honorable Court deems just and proper.

**INTENTIONALLY LEFT BLANK**

Respectfully submitted this 16<sup>th</sup> day of June 2022.

**DOUGLAS LAW FIRM**

By:

  
EMILY CHRISTINE WILLIAMS  
Georgia Bar No. 579779  
Email: [ewilliams@dhclawyers.com](mailto:ewilliams@dhclawyers.com)  
117 N. Second Street  
Palatka, FL 32177  
Toll Free: (800) 705-5457  
Secondary email: [efiling@dhclawyers.com](mailto:efiling@dhclawyers.com)

**General Civil and Domestic Relations Case Filing Information Form**

Superior or  State Court of Catoosa County

**For Clerk Use Only**

Date Filed 06-16-2022  
MM-DD-YYYY

Case Number SUCV2022000448

**Plaintiff(s)**

TAYLOR, GARRY D, Jr.

Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney Williams, Emily

**Defendant(s)**

WATSON, MEAGAN M

Last	First	Middle I.	Suffix	Prefix
WESTERN EXPRESS INC				
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix

Bar Number 579779

Self-Represented

Check one case type and, if applicable, one sub-type in one box.

**General Civil Cases**

- Automobile Tort
- Civil Appeal
- Contract
- Contempt/Modification/Other
- Post-Judgment
- Garnishment
- General Tort
- Habeas Corpus
- Injunction/Mandamus/Other Writ
- Landlord/Tenant
- Medical Malpractice Tort
- Product Liability Tort
- Real Property
- Restraining Petition
- Other General Civil

**Domestic Relations Cases**

- Adoption
- Contempt
  - Non-payment of child support, medical support, or alimony
- Dissolution/Divorce/Separate
- Maintenance/Alimony
- Family Violence Petition
- Modification
  - Custody/Parenting Time/Visitation
  - Paternity/Legitimation
- Support – IV-D
- Support – Private (non-IV-D)
- Other Domestic Relations

Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number \_\_\_\_\_

Case Number \_\_\_\_\_

I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required \_\_\_\_\_

Do you or your client need any disability accommodations? If so, please describe the accommodation request.

**SUPERIOR COURT OF CATOOSA COUNTY  
STATE OF GEORGIA**

CIVIL ACTION NUMBER SUCV2022000448  
TAYLOR, GARRY D, Jr.

**PLAINTIFF**

**VS.**

WATSON, MEAGAN M  
WESTERN EXPRESS INC

**DEFENDANTS**

**SUMMONS**

TO: WATSON, MEAGAN M

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Emily Williams  
Douglas Law Firm  
117 N. Second Street  
Palatka, Florida 32177**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

**This 16th day of June, 2022.**

Clerk of Superior Court

  
\_\_\_\_\_  
Tracy Brown, Clerk  
Catoosa County, Georgia

**SUPERIOR COURT OF CATOOSA COUNTY  
STATE OF GEORGIA**

CIVIL ACTION NUMBER SUCV2022000448  
TAYLOR, GARRY D, Jr.

**PLAINTIFF**

VS.

WATSON, MEAGAN M  
WESTERN EXPRESS INC

**DEFENDANTS**

**SUMMONS**

TO: WESTERN EXPRESS INC

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Emily Williams  
Douglas Law Firm  
117 N. Second Street  
Palatka, Florida 32177**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

**This 16th day of June, 2022.**

Clerk of Superior Court

  
\_\_\_\_\_  
Tracy Brown, Clerk  
Catoosa County, Georgia

IN THE SUPERIOR COURT OF CATOOSA COUNTY  
STATE OF GEORGIA

GARRY DEAN TAYLOR, JR.,

CASE NO.:

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Tracy Brown, Clerk  
Catoosa County, Georgia

Plaintiff,

vs.

**MEAGAN MARIAH WATSON,  
an Individual, and WESTERN EXPRESS INC.,  
a Domestic For-Profit Corporation,**

Defendants.

/

**SUMMONS:**

TO: MEAGAN MARIAH WATSON

You are hereby summoned and required to file with the Clerk of Catoosa County Court and serve upon the Plaintiff's attorney, whose name and address is:

**DOUGLAS LAW FIRM**

Emily Williams  
117 N. 2nd Street  
Palatka, Florida 32177  
Phone: (386) 530-2955  
Fax: (386) 385-5914

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

DATED on \_\_\_\_\_

Clerk of Superior Court

By: \_\_\_\_\_  
Clerk of Superior Court

IN THE SUPERIOR COURT OF CATOOSA COUNTY  
STATE OF GEORGIA

GARRY DEAN TAYLOR, JR.,

CASE NO.:

JUN 16, 2022 03:26 PM

*Tracy Brown*  
Tracy Brown, Clerk  
Catoosa County, Georgia

Plaintiff,

vs.

**MEAGAN MARIAH WATSON,  
an Individual, and WESTERN EXPRESS INC.,  
a Domestic For-Profit Corporation,**

Defendants.

/

**SUMMONS:**

TO: WESTERN EXPRESS INC.

You are hereby summoned and required to file with the Clerk of Catoosa County Court and serve upon the Plaintiff's attorney, whose name and address is:

**DOUGLAS LAW FIRM**

Emily Williams  
117 N. 2nd Street  
Palatka, Florida 32177  
Phone: (386) 530-2955  
Fax: (386) 385-5914

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

DATED on \_\_\_\_\_

Clerk of Superior Court

By: \_\_\_\_\_  
Clerk of Superior Court

IN THE SUPERIOR COURT OF CATOOSA COUNTY  
STATE OF GEORGIA

GERRY DEAN TAYLOR, JR.,

*Plaintiff,*

v.

MEAGAN MARIAH WATSON, AN  
INDIVIDUAL, AND WESTERN EXPRESS,  
INC., A DOMESTIC FOR-PROFIT  
CORPORATION,

*Defendants.*

Civil Action No.: SUCV2022000448

*Tracy Brown*  
Tracy Brown, Clerk  
Catoosa County, Georgia

**DEFENDANT, MEAGAN WATSON'S, ACKNOWLEDGEMENT OF SERVICE**

COMES NOW Meagan Watson, a named Defendant in the above-styled cause of action, by and through her undersigned counsel of record, and hereby acknowledges due and legal service of the Complaint and Summons, the Plaintiff's Complaint and Summons, sufficiency of service of process, and sufficiency of process on the Defendant in the above-captioned action. Further service of the Complaint and Summons on the Defendant is hereby waived.

The Defendant states that by agreeing to acknowledge service the Defendant expressly reserves the right to assert any other affirmative defenses that may be raised in her Answer, including as to the jurisdiction and venue of this Court and this case.

This the 2<sup>nd</sup> day of August, 2022.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

Kevin T. Shires, Esq.  
Georgia Bar No.: 643290  
Loren A. Rafferty, Esq.  
Georgia Bar No.: 678355

Shires, Peake & Gottlieb, LLC  
284 N. Main Street  
Alpharetta, Georgia 30009  
(678) 940-4413  
(678) 940-4420 (Fax)  
[kshires@spgattorneys.com](mailto:kshires@spgattorneys.com)  
[lrafferty@spgattorneys.com](mailto:lrafferty@spgattorneys.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing document upon all parties to this matter by:

x Electronically filing this document with PeachCourt which sends notice via that system to all parties and counsel pursuant to O.C.G.A. § 9-11-5(F) and/or U.S.C.R. 36.16(E)

x Electronically serving this document via email pursuant to O.C.G.A. § 9-11-5 (F) and/or U.S.C.R. 36.16(E) as follows:

\_\_\_\_\_ Depositing a true copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows:

Emily Christine Williams, Esq.  
Douglas Law Firm  
117 N. Second Street  
Palatka, Florida 32177  
[efiling@dhclawyers.com](mailto:efiling@dhclawyers.com)

This the 2<sup>nd</sup> day of August, 2022.

Shires, Peake & Gottlieb, LLC

*/s/ Kevin T. Shires*  
Kevin T. Shires, Esq.  
Georgia Bar No.: 643290

Shires, Peake & Gottlieb, LLC  
284 N. Main Street  
Alpharetta, Georgia 30009  
(678) 940-4413  
(678) 940-4420 (Fax)  
[kshires@spgattorneys.com](mailto:kshires@spgattorneys.com)

IN THE SUPERIOR COURT OF CATOOSA COUNTY  
STATE OF GEORGIA

GERRY DEAN TAYLOR, JR.,

*Plaintiff,*

v.

MEAGAN MARIAH WATSON, AN  
INDIVIDUAL, AND WESTERN EXPRESS,  
INC., A DOMESTIC FOR-PROFIT  
CORPORATION,

*Defendants.*

Civil Action No.: SUCV2022000448

*Tracy Brown*  
Tracy Brown, Clerk  
Catoosa County, Georgia

**DEFENDANT, WESTERN EXPRESS, INC.'S, ACKNOWLEDGEMENT OF SERVICE**

COMES NOW Western Express, Inc., a named Defendant in the above-styled cause of action, by and through its undersigned counsel of record, and hereby acknowledges due and legal service of the Complaint and Summons, the Plaintiff's Complaint and Summons, sufficiency of service of process, and sufficiency of process on the Defendant in the above-captioned action. Further service of the Complaint and Summons on the Defendant is hereby waived.

The Defendant states that by agreeing to acknowledge service the Defendant expressly reserves the right to assert any other affirmative defenses that may be raised in its Answer, including as to the jurisdiction and venue of this Court and this case.

This the 2<sup>nd</sup> day of August, 2022.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

Kevin T. Shires, Esq.  
Georgia Bar No.: 643290  
Loren A. Rafferty, Esq.  
Georgia Bar No.: 678355

Shires, Peake & Gottlieb, LLC  
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(678) 940-4420 (Fax)  
[kshires@spgattorneys.com](mailto:kshires@spgattorneys.com)  
[lrafferty@spgattorneys.com](mailto:lrafferty@spgattorneys.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing document upon all parties to this matter by:

x Electronically filing this document with PeachCourt which sends notice via that system to all parties and counsel pursuant to O.C.G.A. § 9-11-5(F) and/or U.S.C.R. 36.16(E)

x Electronically serving this document via email pursuant to O.C.G.A. § 9-11-5 (F) and/or U.S.C.R. 36.16(E) as follows:

\_\_\_\_\_ Depositing a true copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows:

Emily Christine Williams, Esq.  
Douglas Law Firm  
117 N. Second Street  
Palatka, Florida 32177  
[efiling@dhclawyers.com](mailto:efiling@dhclawyers.com)

This the 2<sup>nd</sup> day of August, 2022.

Shires, Peake & Gottlieb, LLC

*/s/ Kevin T. Shires*  
Kevin T. Shires, Esq.  
Georgia Bar No.: 643290

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